

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Sean Javorsky,	:	Case No.
	:	
Plaintiff,	:	Judge
	:	
vs.	:	Magistrate Judge
	:	
JPMorgan Chase Bank, N.A.,	:	
	:	
Defendant.	:	
	:	

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1441, Defendant JPMorgan Chase Bank, N.A. (“Defendant”) hereby files this Notice of Removal from the Court of Common Pleas of Mahoning County, Ohio on the following grounds:

1. Defendant is the only named defendant in a civil action instituted in the Court of Common Pleas of Mahoning County, Ohio, captioned *Sean Javorsky v. JPMorgan Chase Bank, N.A.*, Case No. 16 CV 2228 (the “Lawsuit”), the Complaint for which was filed by Plaintiff on August 17, 2016.

2. Defendant was served with the Complaint in the Lawsuit on August 30, 2016. This Notice of Removal is filed within thirty days of August 30, 2016 and is therefore timely under 28 U.S.C. § 1446(b).

3. Removal of this case is proper pursuant to 28 U.S.C. § 1441(a) because this Court has original jurisdiction over Plaintiff’s Complaint pursuant to 28 U.S.C. § 1331, which confers jurisdiction in cases arising under the laws of the United States.

4. Plaintiff's Complaint asserts that Defendant has committed violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227. *See* Complaint at pp. 3-4.

5. Therefore, as this action involves a federal question, this Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1441.

6. In addition, pursuant 28 U.S.C. §§ 1367, this Court may exercise supplemental jurisdiction over the lone other claim asserted in Plaintiff's Complaint.

7. Defendant will give written notice of the filing of this Notice of Removal to the adverse party as required by 28 U.S.C. § 1446(d).

8. Defendant will also file a copy of this Notice of Removal with the Clerk of Courts for the Court of Common Pleas of Mahoning County, Ohio as required by 28 U.S.C. § 1446(d).

9. Copies of all pleadings, process, and orders served upon Defendant are attached hereto.

Respectfully submitted,

/s/ Nelson M. Reid

Nelson M. Reid (0068434)

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Counsel for Defendant

JPMorgan Chase Bank, N.A.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notice of Removal was served by Regular Mail on this
27th day of September, 2016 upon the following counsel of record:

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Patrick B. Duricy
Ashley R. Hall
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Attorneys for Plaintiff

/s/ Nelson M. Reid

Nelson M. Reid